

BURSOR & FISHER, P.A.  
Neal Deckant (State Bar No. 322946)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: ndeckant@bursor.com

*Attorneys for Plaintiffs*

*Additional Attorneys on Signature Page*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILINGS CASES

Master File No. 5:22-cv-07557-PCP (VKD)

This document relates to:

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

All actions

The Honorable P. Casey Pitts  
Courtroom 8, 4th Floor

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE THAT** pursuant to Northern District of California Civil Rule Local Rules 7-11 and 79-5, and the protective order issued in the case (Dkt. No. 74), Plaintiffs hereby move the Court for an order allowing them to file under seal excerpts and quotations from documents containing information designated as either Confidential or Highly Confidential – Attorney’s Eyes Only. Plaintiffs state that the “compelling reasons” standard applies. *See Zheng-Lawson v. Toyota Motor Corp.*, 2019 WL 3413253, at \*2–3 (N.D. Cal. July 29, 2019). As to documents designed by Defendant or third parties, Plaintiffs submit this request only to comply with their obligations under Local Rule 79-5 and the protective order issued in the case, and Plaintiffs take no position at this time on the propriety of other parties’ confidentiality designations, or whether they meet the compelling reasons test for retaining confidentiality. As to Plaintiffs’ expert reports, the reports cite information throughout designated as either Confidential or Highly Confidential – Attorney’s Eyes Only by Defendant. Plaintiffs also designate portions of their deposition transcripts revealing personal information (*e.g.*, address, phone number, email, zip code, financial information) as Confidential or Highly Confidential – Attorney’s Eyes Only.

Plaintiffs seek to file the following portions of the Notice of Motion and Motion for Class Certification under seal:

- Page 1, line 7, and 9-12.
- Page 2, line 12, 15, and 21-25.
- Page 3, line 4, 8-14, 23-24, and 26-28.
- Page 4, line 2, 4, and 12-26.
- Page 5, line 6-13, and 16-17.
- Page 13, line 21-22, 24, and 26-28.
- Page 14, line 1-3 and 10-11.
- Page 17, line 25.
- Page 18, line 1-2.

Plaintiffs seek to file the following portions of Exhibit 13: Excerpts of Meta’s 30(b)(6) witness Amlesh Jayakumar under seal:

- Page 19, line 6.
- Page 22, line 6-7.
- Page 43, line 23-25.
- Page 44, line 1-2 and 5-6.
- Page 47, line 3-5 and 7-8.
- Page 49, line 12-20 and 25.
- Page 50, line 2, 7-10, 14-16, and 23-24.
- Page 51, line 1-6, 10-15, and 19-23.
- Page 52, line 1-3, 6-17, and 19-21.
- Page 55, line 11-14.
- Page 56, line 10-11.
- Page 91, line 7, 13, and 21.
- Page 100, line 1, 16-19, 22, and 24.
- Page 101, line 1-5, 8, 11-16, and 19.
- Page 102, line 5-10, 13-20, and 24-25.
- Page 103, line 1, 5-8, and 21.
- Page 104, line 4-7, 9, and 14-17.
- Page 106, line 5, 13-21, and 23-24.
- Page 107, line 2, 5-7, and 16-18.
- Page 108, line 7-16, and 24-25.
- Page 109, line 1-11, 16, and 20-24.
- Page 110, line 2-3, 6-11, 13, 16-17, and 22-25.
- Page 111, line 1-4, 7-8, and 17-24.
- Page 112, line 1-2, 4-7, 11-12, and 16-24.
- Page 113, line 3-7, 9-13, and 15-25.
- Page 114, line 1-7, 10-12, 14-17, and 20-25.
- Page 115, line 1-9, 12, and 15-25.
- Page 116, line 4-8.

- 1 • Page 117, line 1-6, 10, 13-17, and 19-25.
- 2 • Page 118, line 5-14 and 17-23.
- 3 • Page 119, line 5, 7-8, 11, 14, and 16-20.
- 4 • Page 127, line 1-5, 9-13, 17, and 23-25.
- 5 • Page 128, line 1-2, 6, and 8-13.
- 6 • Page 129, line 5-6, 12-21, and 24.
- 7 • Page 130, line 1-4, 6-11, 13-14, 16-19, and 21-22.
- 8 • Page 131, line 3-6, 10, 14, 17-21, and 23.
- 9 • Page 132, line 3, 7-10, 12, 14-17, 19, 22, and 24-25.
- 10 • Page 149, line 20 and 23-25.
- 11 • Page 150, line 1, 5-6, 18-19, and 24-25.
- 12 • Page 151, line 1-2, 7-9, and 14-15.
- 13 • Page 155, line 14-15 and 23-24.
- 14 • Page 156, line 8-9 and 14-20.
- 15 • Page 157, line 4-8, 10-13, 18-21, and 25.
- 16 • Page 158, line 4, 6, 10, 13-17, and 19.
- 17 • Page 159, line 3-6, 10, 14-20, and 23-25.
- 18 • Page 160, line 1-8, 10-16, 18-19, and 21-25.
- 19 • Page 173, line 1-2 and 4-9.
- 20 • Page 174, line 23-24.
- 21 • Page 175, line 2-3, 5-7, 10-11, and 14.
- 22 • Page 202, line 24-25.
- 23 • Page 203, line 1-6.
- 24 • Page 204, line 9-13 and 23.
- 25 • Page 205, line 2, 4-5, 8-11, 17, and 23-24.
- 26 • Page 206, line 18-22 and 24-25.
- 27 • Page 208, line 6-14 and 21-25.
- 28 • Page 209, line 1-3.

Plaintiffs seek to file the following documents entirely under seal:

- Exhibit 5: Defendant's Supplemental Responses to Plaintiffs' First Interrogatories
- Exhibit 14: PIXEL\_TAX000022472-73
- Exhibit 15: PIXEL\_TAX000023123-25
- Exhibit 16: PIXEL\_TAX000003585
- Exhibit 17: PIXEL\_TAX000003585
- Exhibit 18: PIXEL\_TAX0000023328
- Exhibit 19: Excerpts of Meta's 30(b)(6) witness Amlesh Jayakumar in the related matter *In re Meta Healthcare Litig.*, N.D. Cal. Case No. 3:22-cv-3580-WHO, taken on May 21, 2025
- Exhibit 20: PIXEL\_TAX0000052702-704
- Exhibit 21: PIXEL\_TAX0000052648
- Exhibit 22: PIXEL\_TAX000036169
- Exhibit 23: PIXEL\_TAX000023047
- Exhibit 24: PIXEL\_TAX000023180-84
- Exhibit 25: PIXEL\_TAX000004297-98
- Exhibit 26: PIXEL\_TAX000058899-905
- Exhibit 27: Expert Report of Colin Weir
- Exhibit 28: Expert Report of Robert Zeidman

Dated: August 18, 2025

By: /s/ Neal J. Deckant  
Neal J. Deckant

**BURSOR & FISHER, P.A.**

Neal Deckant (State Bar No. 322946)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: jsmith@bursor.com

**SMITH KRIVOSHEY, P.C.**

Joel D. Smith (State Bar No. 244902)  
867 Boylston Street, 5th Floor  
Boston, MA 02216  
Telephone: 617-377-7404  
Email: joel@skclassactions.com

**GEORGE FELDMAN MCDONALD, PLLC**

Lori G. Feldman (*pro hac vice*)  
Michael Liskow (State Bar No. 243899)  
102 Half Moon Bay Drive  
Croton-on-Hudson, NY 10520  
Telephone: (917) 983-9321  
E-mail: lfeldman@4-justice.com  
mliskow@4-justice.com  
eservice@4-justice.com

**GEORGE FELDMAN MCDONALD, PLLC**

Rebecca A. Peterson (241858)  
1650 W 82nd Street, Suite 880  
Bloomington, MN 55431  
Telephone: (612) 778-9595  
Fax: (888) 421-4173  
Email: RPeterson@4-Justice.com  
eService@4-Justice.com

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

Kate M. Baxter-Kauf (*pro hac vice*)  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
Facsimile: (612) 339-0981  
kmbaxter-kauf@locklaw.com

**THE HODA LAW FIRM, PLLC**

Marshal J. Hoda, Esq. (*pro hac vice*)  
12333 Sowden Road, Suite B  
Houston, TX 77080  
Telephone: (832) 848-0036  
Email: marshal@thehodalawfirm.com

**FOSTER YARBOROUGH PLLC**

Patrick Yarborough, Esq. (*pro hac vice*)  
917 Franklin Street, Suite 220  
Houston, TX 77002  
Telephone: (713) 331-5254  
Email: patrick@fosteryarborough.com

**EMERSON FIRM, PLLC**

John G. Emerson (*pro hac vice*)  
2500 Wilcrest, Suite 300  
Houston, TX 77042  
Telephone: (800) 551-8649  
Email: jemerson@emersonfirm.com

*Attorneys for Plaintiffs*